

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and
the Estate of Bernard L. Madoff,

Plaintiff,

v.

INTELIGO BANK LTD., f/k/a BLUBANK LTD.,

Defendant.

Adv. Pro. No. 11-02763 (CGM)

STIPULATION AND ORDER TO AMEND BRIEFING SCHEDULE

Irving H. Picard (the “Trustee”), as trustee for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–III, and the chapter 7 estate of Bernard L. Madoff, and defendant Inteligo Bank Ltd., f/k/a Blubank Ltd. (“Defendant”), by and through their respective, undersigned counsel, hereby stipulate and agree as follows:

WHEREAS, on March 15, 2022, the Court entered a stipulation and order that set a briefing schedule for Defendant's motion to dismiss the Trustee's Complaint, ECF No. 114;

WHEREAS, Defendant has requested an extension of the deadline to file Defendant's motion to dismiss the Trustee's Complaint, and

WHEREAS, the parties have met and conferred and the Trustee consents to the foregoing request;

IT IS MUTUALLY AGREED AND STIPULATED, by and between the Trustee and Defendant, and **SO ORDERED**, by the Court that:

1. Defendant shall respond to the Complaint by June 27, 2022. If Defendant files a motion to dismiss the Complaint, such motion shall set forth any and all grounds for dismissal at the pleading stage.
2. The Trustee shall respond to the motion by August 25, 2022.
3. The Defendant shall file its reply by September 26, 2022.
4. If Defendant files such a motion to dismiss the complaint, the parties shall seek oral argument on the motion at the Court's first available convenience.
5. The above deadlines granted by this Stipulation are without prejudice to either party seeking future extensions of time.
6. Except as expressly set forth herein, the parties to this Stipulation reserve all rights, arguments, claims, objections and/or defenses they may have and entry into this Stipulation shall not impair or otherwise affect any such rights, arguments, claims, objections and/or defenses.

7. This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photocopy, or electronic copy of this Stipulation shall be deemed an original.

BAKER & HOSTETLER LLP

By: /s/ Stephanie A. Ackerman
45 Rockefeller Plaza
New York, New York 10111
Telephone: 212.589.4200
Facsimile: 212.589.4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Amy E. Vanderwal
Email: avanderwal@bakerlaw.com
Stephanie A. Ackerman
Email: sackerman@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities
LLC and the Chapter 7 Estate of Bernard L.
Madoff*

WINSTON & STRAWN LLP

By: /s/ Heather Lamberg
Heather Lamberg
1901 L Street NW
Washington, D.C. 20036
Telephone: (202) 282-5274
Facsimile: (202) 282-5100
Email: hlamberg@winston.com

Attorneys for Defendant Inteligo Bank Ltd.

**WINDELS MARX LANE &
MITTENDORF, LLP**

By: /s/ Howard L. Simon
156 West 56th Street
New York, New York 10019
Telephone: 212.237.1000
Facsimile: 212.589.4201
Howard L. Simon
Email: hsimon@windelsmarx.com

*Special Counsel to Irving H. Picard, Trustee
for the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff Investment*

*Securities LLC and the Chapter 7 Estate of
Bernard L. Madoff*

SO ORDERED.

**Dated: June 1, 2022
Poughkeepsie, New York**



/s/ Cecelia G. Morris

**Hon. Cecelia G. Morris
U.S. Bankruptcy Judge**